

### **REMARKS**

Claims 1-22 are presently pending in the application. Claims 1-22 are rejected. Claims 1, 4, 8, 12, 16 and 19 have been amended. The specification and drawings stand as filed.

Reconsideration of the objections and rejections set forth in the aforementioned Office Action is respectfully requested in view of the following remarks. The basis for the amendments can be found throughout the Specification, Claims and Drawings as originally filed.

### **INTERVIEW SUMMARY**

The Applicant would like to thank the Examiner for the courtesies extended to his representative, Donald G. Walker, during a telephonic interview conducted on November 30, 2005. During the interview, the rejection to claim 8 based on Gomi was discussed. The Examiner agreed with the Applicant that the retainer ring and punch insert of Gomi is axially movable along a single axis relative to the die insert and that the retainer ring and punch insert of Gomi is not movable in a direction other than along that single axis. The Examiner also agreed that the retainer ring and punch insert of Gomi is not movable along a first axis of the die insert and an axis offset from the first axis of the die insert. The Applicant agreed to amend the claims to clearly recite features not disclosed by Gomi. Accordingly, the Applicant respectfully requests the amendments to be entered and the case allowed.

### **CLAIM REJECTIONS – 35 U.S.C. § 112**

Claims 4, 12 and 19 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point and distinctly claim the subject matter which Applicant regards as the invention.

Applicant has amended Claims 4, 12 and 19 to correct the claim dependencies and overcome the § 112 rejections. Accordingly, Applicant respectfully requests withdrawal of the § 112 rejections.

**REJECTION UNDER 35 U.S.C. § 102**

Claims 1-22 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Gomi (U.S. Pat. No. 6,332,347).

Applicant has amended claim 1 to note that the die insert has a first axis and that the punch insert is movable along a second axis. Furthermore, the punch insert is movable relative to the die insert to a position where the second axis is offset from the first axis. Applicant respectfully submits that a die as defined by presently amended claim 1 is not disclosed by Gomi. Specifically, Gomi discloses a punch insert that is only movable along a single axis that maintains a positional relationship relative to a die insert axis. Accordingly, Applicant respectfully requests withdrawal of the § 102 rejection relating to claims 1-7.

Regarding claims 8-15, Applicant has amended claim 8 to note that the retainer ring is axially movable relative to the die insert along an axis of the die insert and that the retainer ring radially floats relative to the axis of the die insert and where the retainer ring is aligned with the axis of the die insert when in the engaged position. The Applicant respectfully submits that Gomi does not disclose a finished pass die as defined by amended claim 8. Accordingly, Applicant requests withdrawal of the § 102 rejections to claims 8-15.

Regarding claims 16-22, claim 16 has been amended to recite that the die insert has an axis and that the retainer ring is movable relative to the die insert along the die insert axis as well as in a direction substantially perpendicular to the die insert axis. The

Applicant respectfully submits that Gomi discloses a retainer ring and punch insert that is movable relative to the die insert only along a single axis. Accordingly, Applicant respectfully requests withdrawal of the § 102 rejections to claims 16-22.

**CONCLUSION**

All of the grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding office action, and as such, the present application is in condition for allowance.

If it is believed that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600. Prompt and favorable consideration of this amendment is respectfully requested.

Respectfully submitted,

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